Appl. No.	:	10/658,246	Confirmation No.	4125
Applicant	:	Zizzi		
Filed	:	09/08/2003		
TC/A.U.	:	2132		
Examiner	:	Darrow		
Docket No.	:	M000-P03098US		
Customer No.	:	33356		

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Declaration of Paul Halpern

Background

1. I, Paul Halpern, am the Information Systems Manager at Fulbright & Jaworski LLP. I have a B.S. degree in Management Information Systems from American College of Computer and Information Sciences (ACCIS). I have over 25 years experience in the information systems industry, and spent the last 15 years managing information systems in law firms. My curriculum vitae is attached as Exhibit H-1.

2. I have reviewed Application No. 10/658,246 and understand the inventions described and claimed therein.

Introduction to MAZ in Fall 1996

3. In 1996, I was the Information Technology Manager at Frandzel & Share. While at Frandzel, I was called upon by an attorney to find a way to encrypt documents which resided on a server on our network in the PC DOCS EDMS repository. The encryption needed to function in such a way that the user would not be directly involved after the initial encryption was created.

4. I investigated many different encryption programs and, in the course of that investigation, contacted MAZ Technologies, Inc. (MAZ). I originally met with Steve Zizzi (Zizzi) and explained to him what we needed and the value of that need. I also explained that I could not find such an encryption program anywhere.

5. At the time, MAZ was only selling the IntelliGard M products. These products provided a smart card reader and some software. I insisted, however, that the firm's attorneys would not use a product like IntelliGard M Series or any other that required additional time and/or steps in the process of encryption and decryption.

6. That initial conversation led to more discussions with Zizzi and Chris Mahne (Mahne) about the need for an encryption program that could seamlessly integrate with a Document Management System. I encouraged Zizzi and Mahne to look into the feasibility of creating such a program.

7. During 1996 and 1997, I had a high level of expertise in the PC DOCS EDMS – reaching down into its structure and internal operations. At Frandzel & Share, I was responsible for configuring and maintaining the PC DOCS EDMS, including its SQL tables. I also obtained a deeper relationship with PC DOCS and the user community as Chairman of the PC DOCS User Group.

8. I liked and respected the people at MAZ, and believed that their technology had the potential to deliver considerable benefit to our firm and others. Therefore, in the Fall of 1996, I introduced Zizzi and Mahne to people at PC DOCS. I understood that there was some technical exchange between MAZ and PC DOCS. Sometime later, but before I left Frandzel, the technology behind a new MAZ application was explained to me. Basically, it involved intercepting the "call" from the word processing program to the PC DOCS EDMS. This new MAZ application became IntelliGard E.

The Sale to Lyon & Lyon in Summer 1997

9. I left Frandzel & Share in June 1997 to another job opportunity in the IT department at Lyon & Lyon, one of the country's leading and largest intellectual property law firms. I stayed in touch with MAZ, however, and continued to encourage them to develop an IntelliGard product which

integrated with the PC DOCS EDMS. They reported that they had such a product under development.

10. Lyon & Lyon was doing a major upgrade of their network and computer systems, and was installing the latest version of the PC DOCS EDMS. I was partially responsible for the selection and purchase of the MAZ product for Lyon & Lyon. I introduced Lyon & Lyon to Mahne and Zizzi and encouraged the firm to consider the MAZ product. I also did all of the testing of the product for Lyon & Lyon.

11. In June 1997 MAZ pitched us on their new IntelliGard E product, and I saw in IntelliGard E the product I had long wanted. We immediately began negotiations on a sale to Lyon & Lyon. In July or August of 1997, MAZ provided me with a beta version of IntelliGard E which I installed and used. Though buggy, the product provided the basic functionality which I had been demanding – transparent encryption and decryption at the file level, keys stored on a smart card, and seamless integration with the PC DOCS EDMS.

12. As a direct result of my testing of the product, and MAZ's modifications therefrom, MAZ did offer to sell Lyon & Lyon the first version of the product. I do not recall the exact date, but I believe that it was in July or August of 1997. I do not recall the price, but the figure of $50 per seat comes to mind. As a result, Lyon & Lyon committed to purchasing IntelliGard E for the entire firm.

13. The MAZ product queried the SQL database behind the PC DOCS EDMS. As I recall, MAZ added their own table to this SQL database in order to keep track of which documents were encrypted, the issued keys for those documents, and other needed information. The concept for all this was in place and either clear or communicated to me no later than July 1997, and the actual table was inserted into SQL and testing began in either August or early September 1997.

14. The version of the IntelliGard E product that MAZ first pitched and then sold to Lyon & Lyon included (or MAZ made clear would include) the following features:

   a. The IntelliGard E software was installed on individual Windows-based PCs, along with the PC DOCS/SQL client. The PCs has other software, including Microsoft Word. The PC

DOCS EDMS was used to store the documents created and accessed through MS Word.

b. If a user did a file-level access through Word (e.g., "open" "close," "save" or "save as"), the IntelliGard E software would trap the call and either encrypt or decrypt the document, depending on the type of call.

c. The IntelliGard E software tracked which documents were encrypted or needed to be encrypted/decrypted using a table in the PC DOCS EDMS. The table identified both the names of the documents and the names of the encryption/decryption keys for those documents. I think it is accurate to say that there was a direct association between document names and key names in the table.

d. The IntelliGard E software would use the key name in the table to obtain the appropriate key from the smart card. Then, depending on the type of event, the IntelliGard E software would automatically encrypt or decrypt the document using the key value.

e. The IntelliGard E software automatically passed control back to the PC DOCS EDMS so that the PC DOCS EDMS could complete the command.

15. At some point in time, well after the sale and installation at Lyon & Lyon, I was issued 2500 shares of MAZ stock. I understood this to be a very, very minor share in the company, and I think it was an expression of gratitude by MAZ for my belief in them. My ownership of the MAZ stock had no influence on my providing this declaration.

Affirmation

16. I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that there statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of any patent issuing from Application No. 10/658,246.
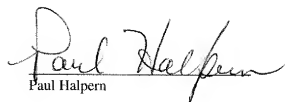
Date: _April 10, 2006_ _Paul Halpern_
Paul Halpern

Exhibit H-1

Curriculum Vitae of

Paul Halpern

Exhibit H-1

Curriculum Vitae of

Paul Halpern

EDUCATION

B.S. Management Information Systems,
American College of Computers and Information Sciences
Novell Certified NetWare Engineer (CNE)

ACHIEVEMENTS

7/00 – now **IT Manager** (*Fulbright & Jaworski L.L.P.*)
Manage branch office IT Department

6/97 – 2/00 **Director of Information Technology** (*Lyon & Lyon LLP*)
- Manage 12 IT Department personnel plus six help desk reps
- Supervise the purchase/installation of Mitel/Nortel phones, Octel voicemail
- Oversee hands-on technical areas, including Systems Administration, PC DOCS, SQL server
- Negotiate nationwide contracts with IT vendors

7/95 – 6/97 **LAN/WAN System Manager** (*Frandzel & Share*)
- Install/Maintain NetWare 4.1 network (Windows 3.11)
- Oversee hands-on technical areas including Groupwise, PC DOCS, SQL server

4/94 – 7/95 **Office Automation Coordinator** (*Burke, Williams & Sorensen*)
Maintain/upgrade 100 user NetWare 3.12 networks for 75-attorney, five-office
Firm.

1/94 – 4/94 **MIS Assistant on NetWare 3.11** (*Lewis, D'Amato, Brisbois & Bisgaard*)
Assistant to MIS Director in 150 attorney home office. Novell/Windows

8/88 – 12/93 **MIS Supervisor/Systems Admin** (*Arter & Hadden*)
Maintenance/operation of Wang VS100 for 125+ users in 2 offices.

6/81 – 8/88 **Word Processing Department Supervisor** (*Zobrist & McCullough*)

MISC.

Speaker: DOCSummit '98; LegalTech '98
Chairperson: Southern California PC DOCS User Group
Quoted in Knowledge Management World and other national publications